

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**ERICSSON INC. and
TELEFONAKTIEBOLAGET LM
ERICSSON,**

Plaintiffs,

v.

APPLE INC.,

Defendant.

CIVIL ACTION NO. 2:15-cv-288

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to the Court's Order of May 7, 2015 and the sample Docket Control Order provided by the Court at the parties' May 29, 2015 scheduling conference, Plaintiffs Ericsson Inc. and Telefonaktiebolaget LM Ericsson (collectively, "Ericsson") and Defendant Apple Inc. ("Apple") jointly submit a proposed Protective Order, attached hereto.

Dated: June 19, 2015

Respectfully submitted,

MCKOOL SMITH, P.C.

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APPLE INC.**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that Ericsson and Apple have discussed the Joint Protective Order. After meeting and conferring by email and phone on the issues, the parties agreed they had reached an agreement on the issues.

/s/ Josh Budwin

Josh Budwin

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was electronically filed with the CM/ECF system per LR 5.1, and that all interested parties are being served with a true and correct copy of these documents via the CM/ECF system on June 19, 2015.

/s/ Josh Budwin

Josh Budwin